

Linda M. Tirelli, Esq.
Garvey Tirelli & Cushner, Ltd.
Westchester Financial Center
50 Main Street, Suite 390
White Plains, NY 10606
Ph. (914)946-2200
Email:LindaTirelli@TheGTCFirm.com

Hearing Date: May 21, 2014
Hearing Time: 10:00am

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
WHITE PLAINS DIVISION**

In Re:	§
CYNTHIA CARRSOW-FRANKLIN	§
DEBTOR	§ CHAPTER 13 § Bankruptcy Case No. 10-20010(RDD)
	§
	§
-----	§
CYNTHIA CARRSOW-FRANKLIN	§
	§
MOVANT.	§
	§
V.	§
	§
WELLS FARGO BANK, N.A.	§
	§
RESPONDANT	§

Third Supplement to Respondent's Motion to Reopen Discovery Post Trial

By way of Third Supplemental to the Debtor/Respondent's Emergency Motion to Reopen Discovery filed with this Court on or about March 17, 2014 (see ECF Docs. Nos. 98, 99 and 100) the Debtor hereby says as follows:

1. The purported creditor Wells Fargo Bank, NA admitted the authenticity of the Wells Fargo Attorney Procedure Manual in an unrelated adversary case Mota v. Wells Fargo Bank, NA et al 13-01553-alg pending in the US Bankruptcy Court S.D.N.Y. and further conceded the same is neither a privileged nor a confidential document; and

2. Attached hereto is a full copy of the Wells Fargo Attorney Procedure Manual for Your Honor's consideration in deciding the pending the motion scheduled for hearing on My 21, 2014.

This the 8th Day of April 2014.

/S/ Linda M. Tirelli _____
Linda M. Tirelli, Esq.,
Counsel for the Debtor
Garvey Tirelli & Cushner, Ltd.
Westchester Financial Center
50 Main Street, Suite 390
White Plains, NY 10606
Ph. (914)946-2200
Emai:LindaTirelli@TheGTCFirm.com